

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
JESSICA DAVIDSON, ESQ.**

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC. I make this Certification based on personal knowledge and in support of Defendants' Motion to Exclude the Opinions of Susan Bain.

2. Attached hereto as Exhibit 1 is a true and accurate copy of the Report of Susan Bain, dated October 31, 2022, served in MDL 2875. This document has been filed with redactions to the extent it contains information that has been designated as "PROTECTED INFORMATION" as defined in the Protective Order.

3. Attached hereto as Exhibit 2 is a true and accurate copy of the transcript of the deposition of Susan Bain, in MDL 2875, dated January 31, 2023. This document has been filed with redactions to the extent it contains information that

has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

4. Attached hereto as Exhibit 3 is a true and accurate copy of Exhibit 2 (Supplemental List of Documents Reviewed, dated January 29, 2023) to the deposition of Susan Bain, in MDL 2875, dated January 31, 2023.

5. Attached hereto as Exhibit 4 is a true and accurate copy of ZHP02450736 (Audit Report, dated September 27, 2017). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

Respectfully submitted,

/s/ Jessica Davidson

Jessica Davidson (DC Bar No. 457021)
(Admitted to Practice in Maryland and the
District of Columbia; Not Admitted in New
York)

*Liaison Counsel for Manufacturer
Defendants*

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

One Manhattan West

New York, NY 10001

Telephone: (212) 735-3000

Facsimile: (917) 777-2588

jessica.davidson@skadden.com

*Attorneys for Zhejiang Huahai
Pharmaceutical Co., Ltd., Huahai
U.S., Inc., Princeton Pharmaceutical
Inc., and Solco Healthcare U.S., LLC*

Dated: March 13, 2023